

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Post-Effective Date Debtors	§	
	§	
Debtors.¹	§	(Jointly Administered)

DECLARATION OF KARL D. BURRER

I, Karl D. Burrer, pursuant to 28 U.S.C. Section 1746, declare that the following is true to the best of my knowledge, information, and belief:

1. I am a shareholder with Greenberg Traurig, LLP, which maintains an office for the practice of law at 1000 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and I am admitted to practice before the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas.

2. I submit this declaration (the “Declaration”) in Support of *BP Exploration & Production Inc.’s Witness and Exhibit List*, (the “Exhibit List”) which is being filed concurrently herewith in the above-referenced case and in preparation for the hearing on the *Emergency Motion of QuarterNorth Energy LLC to Enforce the Confirmation Order and Plan* [Dkt. No. 2199].

¹ According to the Post-Effective Date Debtors, the Post-Effective Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Fieldwood Energy LLC (6778), Fieldwood Energy Offshore LLC (4994); Fieldwood Energy Inc. (4991); GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC and Fieldwood Energy Inc. are managed by the Plan Administrator, whose primary mailing address is 16255 Ventura Boulevard, Suite 440, Encino, California 91436, c/o Province, LLC. GOM Shelf LLC and FW GOM Pipeline, Inc., (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore, LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline, LLC (5703); and Galveston Bay Processing LLC (0422).

3. The document listed on the Exhibit List and filed as Exhibit 9 is a true and correct copy of an email exchange dated July 26, 2021. by and among Karl D. Burrer, counsel BP Exploration & Production, Clifford Carlson and Alfredo Perez, counsel for Fieldwood Energy, LLC, et. al., former Debtors and Debtors-in-Possession in Case No. 20-33948.

4. The document listed on the Exhibit List and filed as Exhibit 10 is a true and correct copy of an email exchange with the last email message dated September 10, 2021 by and among Karl D. Burrer, counsel BP Exploration & Production, and Clifford Carlson, counsel for Fieldwood Energy, LLC, et. al., former Debtors and Debtors-in-Possession in Case No. 20-33948.

5. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: November 26, 2021
Houston, Texas

/s/ Karl D. Burrer
Karl D. Burrer